

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(CENTRAL DIVISION)

**In re:**

**MAIN STREET MASSACHUSETTS, LLC  
d/b/a LOWELL SPINNERS  
f/k/a DIAMOND ACTION CORP.,**

**Debtor.**

**Chapter 7  
Case No. 22-40924-EDK**

**TRUSTEE'S NOTICE OF ABANDONMENT OF ESTATE PROPERTY**  
**(Re: Miscellaneous Personal Property Currently Located in Storage Units)**

To the Honorable Elizabeth D. Katz, Chief Judge, United States Bankruptcy Judge:

Pursuant to 11 U.S.C. § 554(a), Rule 6007 of the Federal Rules of Bankruptcy Procedure, and MLBR 6007(1)(b), Jonathan R. Goldsmith, the Chapter 7 trustee (the "Trustee") of the bankruptcy estate (the "Estate") of Main Street Massachusetts, LLC d/b/a Lowell Spinners f/k/a Diamond Action Corp. (the "Debtor"), hereby gives notice of his intention to abandon (the "Notice of Abandonment") any and all of the Estate's interest in the Debtor's miscellaneous personal property currently located in storage units at Quad Cities Storage in Davenport, Iowa (the "Storage Units") and identified on the amended Personal Property Exhibit (the "Assets") attached to the Notice of Amended Personal Property List Attached to Schedules A/B and Statement of Financial Affairs (the "Notice of Amended Personal Property") [Dkt. No. 15]. A complete copy of the Notice of Amended Personal Property is attached hereto as **Exhibit A**. The Assets include, but are not limited to, well-used and, in some instances, broken, office equipment, including, among other items, televisions, ticket printers, office chairs, and computers, as well as a mower and merchandise from the team store, all owned by the Debtor.

In support hereof, the Trustee submits the following:

1. On December 29, 2022, the Debtor filed a petition for relief under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”).

2. On December 30, 2022, the United States Trustee appointed Jonathan R. Goldsmith Chapter 7 trustee of this case and he continues to serve as such.

3. On January 25, 2023, the Trustee conducted the initial meeting of creditors pursuant to Bankruptcy Code § 341(a) (the “§ 341(a) Meeting”).

4. During the § 341(a) Meeting, the Trustee reviewed the Debtor’s schedules and discussed the Assets with David Heller, the Debtor’s managing member (“Mr. Heller”), to determine, among other things, whether the Assets would be of any value to the Estate. The Trustee learned that the Assets are currently located in the Storage Units and that storage space rental fees continue to accrue at the rate of \$1,600.00 per month.

5. Prior to the Debtor’s bankruptcy filing, the Debtor was forced to vacate LeLacheur Park in Lowell, Massachusetts and move the Assets from Lowell, Massachusetts to Davenport, Iowa, which is the location of the Quad Cities River Bandits, another minor league team owned by Mr. Heller and unaffiliated with the Debtor.

6. The current balance owed by the Debtor to Main Street Iowa, LLC, the entity that owns the Quad Cities River Bandits, is not less than \$62,170.29, including storage fees and costs to move the Assets. A breakdown of the storage fees and moving costs is attached hereto as

**Exhibit B.**

7. Based on the Trustee’s investigation, the Trustee has determined that the Assets are unlikely to yield any benefit to the Debtor’s creditors and/or the Estate should he try to sell the Assets.

8. Accordingly, the Trustee believes it is in the best interest of the Estate that he be allowed to abandon the Estate's interest in the Assets without further notice or hearing.

**Please be advised that objections to this Notice of Abandonment must be filed in the Office of the Clerk, United States Bankruptcy Court, U.S. Federal Courthouse, 300 State Street, Springfield, Massachusetts 01105, to be received within fourteen (14) days of November 14, 2023 (i.e., November 28, 2023), with copies mailed within such time to the Chapter 7 Trustee, Jonathan R. Goldsmith, Goldsmith, Katz & Argenio, P.C., 1350 Main Street, Suite 1505, Springfield, Massachusetts 01103. Pursuant to Federal Rule of Bankruptcy Procedure 6007(a), if no such objections are received within fourteen (14) days of November 14, 2023 (i.e., November 28, 2023), the within Trustee's Notice of Abandonment of Estate Property shall be final and binding upon all parties without further notice, hearing or order from the Court.**

Respectfully submitted,

JONATHAN R. GOLDSMITH,  
CHAPTER 7 TRUSTEE

/s/ Jonathan R. Goldsmith, Esq.  
Jonathan R. Goldsmith, BBO #548285  
Goldsmith, Katz & Argenio, P.C.  
1350 Main St., Suite 1505  
Springfield, MA 01103  
Phone: 413.747.0700  
Fax: 413.781.3780  
Email: jgoldsmith@gkalawfirm.com

Dated: November 14, 2023

# EXHIBIT A

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(CENTRAL DIVISION)**

**In re:**

**MAIN STREET MASSACHUSETTS, LLC  
D/B/A LOWELL SPINNERS  
F/K/A DIAMOND ACTION CORP.,**

**Debtor.**

**Chapter 7  
Case No. 22-40924-EDK**

**NOTICE OF AMENDED PERSONAL PROPERTY LIST ATTACHED TO  
SCHEDULES A/B AND STATEMENT OF FINANCIAL AFFAIRS**

NOW COMES Main Street Massachusetts, LLC d/b/a Lowell Spinners f/k/a Diamond Action Corp. (hereinafter "Debtor"), and hereby provides notice of its amendments to its Schedules A/B ("Schedules") and Statement of Financial Affairs ("SOFA") as follows:

Attached to the Schedules (in response to Part 5, Paragraph No. 22) and the SOFA (in response to Part 10, Paragraph No. 20) is an Exhibit listing the Debtor's physical personal property assets by location and item (the "Personal Property Exhibit"). The Debtor has amended the Personal Property Exhibit to more accurately reflect the location and status of the personal property listed therein. The amended Personal Property Exhibit has been filed with this Honorable Court on the day hereof and is attached hereto as **Exhibit A**.

Respectfully Submitted,

MAIN STREET MASSACHUSETTS, LLC  
D/B/A LOWELL SPINNERS  
F/K/A DIAMOND ACTION CORP.

By its attorney,

/s/ Joseph H. Baldiga

Joseph H. Baldiga, BBO #549963  
Mirick, O'Connell, DeMallie & Lougee, LLP  
1800 West Park Drive, Suite 400  
Westborough, MA 01581  
Phone: 508.898.1501  
Fax: 508.898.1502  
Email: [jbaldiga@mirickoconnell.com](mailto:jbaldiga@mirickoconnell.com)

Dated: February 22, 2023

**Exhibit A**

Main Street Massachusetts, LLC, Debtor  
Chapter 7, Case No. 22-40924-EDK

Schedule A/B – Part 5, Paragraph No. 22

and

Statement of Financial Affairs – Part 10, Paragraph 20

(AMENDED)



Lowell Spinners Assets (Amended)

Location	Item
Quad Cities storage	Pirate Ship (amusement ride) (condemned)
<del>Quad Cities storage</del>	<del>Space Camp (amusement ride)</del> (exchanged for labor; SOFA #13.2)
LeLacheur Park	Souvenir Merchandise Cart
LeLacheur Park	6 1/2 x 12" utility trailer w/ Ramp gate
LeLacheur Park	Manitowic Crush Ice Machine
LeLacheur Park	Trackless train package
LeLacheur Park	Inflatable sphere
LeLacheur Park	New Register
LeLacheur Park	Dunk tank
LeLacheur Park	Under counter refrigerator
LeLacheur Park	Three under counter refrigerators for grill areas
LeLacheur Park	Ice Machine
LeLacheur Park	CCTV System Camera for Clubhouse
LeLacheur Park	Used Dishwasher
LeLacheur Park	(2) 10' SS Tables w/Backsplash
<del>Quad Cities storage</del>	<del>3 Wireless Credit Machines</del> (Returned to Stadium One; SOFA #3)
LeLacheur Park	New 180x180' Field Tarp
LeLacheur Park	Field Tarp Tube Roller
LeLacheur Park	Field Roller Cap
Quad Cities storage	Cooker & Hold <del>Warmer</del> (10 pan)
LeLacheur Park	Slide Rails for Cooker & Hold Oven
LeLacheur Park	60 lbs Capacity Washer, w/delivery & freight
Quad Cities storage	Video Camera
LeLacheur Park	New 18 by 42SF Field Tarp
<del>Quad Cities storage</del>	<del>New 12x75' Field Tarp</del> (not removed from Lowell; tarps are usually square, 180x180 or 160x160, for example)
LeLacheur Park	Storage Covers for New Tarps
LeLacheur Park	Inst D/Washer, Sewage Ejector, Sink, Venting
Quad Cities storage	3 Mascot Costumes
LeLacheur Park	World's Largest Jersey
LeLacheur Park	Concession Stanchions
<del>Quad Cities storage</del>	<del>50/50 Raffle Scanners</del> (not removed from Lowell)
<del>Quad Cities storage</del>	<del>10 Cash drawers in carts</del> (not removed; returned to Stadium One)
LeLacheur Park	6' Versa salad bars w/tray rails
LeLacheur Park	2 Full size gas convection ovens
LeLacheur Park	23 Outdoor Speakers
LeLacheur Park	12 All Weather Speakers
LeLacheur Park	23 Standard Flat Panels
Quad Cities storage	37 - 60" LED TVs (JVC)
LeLacheur Park	Video camera, transmitter
<del>Quad Cities storage</del>	<del>10 POS register units</del> (no; returned to Stadium One)
LeLacheur Park	20 Trash receptacles
returned to Stadium 1	3 - POS registers
LeLacheur Park	Upgraded surveillance, alarm system
<del>Quad Cities storage</del>	<del>Wireless Camera video room</del> (not removed from Lowell)

<del>Quad Cities storage</del>	<del>18 Phones</del>	(not removed from Lowell)
<del>Quad Cities storage</del>	<del>New Video Camera</del>	(not removed from Lowell)
<del>Quad Cities storage</del>	<del>Ticket Scanners (6)</del>	(no, returned)
LeLacheur Park	Canopy Grills (2)	
Quad Cities storage	Used Exmark Mower	
LeLacheur Park	Scoreboard Clock	
Gervais Ford	Used 1993 Ford Van	
Quad Cities storage	Replaced player uniforms	
LeLacheur Park	Wood Shed	
LeLacheur Park	Two Storage Sheds	
LeLacheur Park	Bat Cabinet	
LeLacheur Park	Kids area renovations	
LeLacheur Park	Transformer Fence	
LeLacheur Park	Scoreboard	
LeLacheur Park	Poles	
LeLacheur Park	Three storage sheds	
LeLacheur Park	17 auto hand drive	
LeLacheur Park	Waste Mgmt scoreboard	
LeLacheur Park	Fryolater gas piping	
LeLacheur Park	Souvenir Sign	
LeLacheur Park	HP Hood sign	
LeLacheur Park	New Signs at Center Field	
LeLacheur Park	Gator Pit sink & Installation	
LeLacheur Park	Outfield wall	
LeLacheur Park	Back Lit Signage	
LeLacheur Park	Back Lit Signage	
LeLacheur Park	10' X 50' Storage Shed	
LeLacheur Park	Infield Renovations	
LeLacheur Park	Pitcher mound renovations	
LeLacheur Park	Gator Pit Awning	
LeLacheur Park	96" extension to groundskeeping fence	
LeLacheur Park	Sun/Wind Screen	
LeLacheur Park	8 X 28 Storage shed for concessions	
LeLacheur Park	Swivel seats and table	
LeLacheur Park	Party deck 1st Base 4 tables/Seating (14 Seats in	
LeLacheur Park	Souv fixtures for upstairs store	
LeLacheur Park	Rollup steel door for upstairs souv store	
LeLacheur Park	Custom awning for souv store upstairs	
LeLacheur Park	Electrical upgrades for souv store upstairs	
LeLacheur Park	Stadium Lights	
LeLacheur Park	Electrical upgrades	
LeLacheur Park	Emer Lighting Backup Batteries	
LeLacheur Park	HP BBQ Awning	
LeLacheur Park	Extended Field Netting, poles & installation	
leased; returned to Atlantic	Used Sharp digital color copier	(returned to Atlantic)
Quad Cities Storage	48 Boca Lemur ticket printer	
Quad Cities Storage	Server for Ticket System	(not removed from Lowell)

LeLacheur Park

LeLacheur Park

Quad Cities Storage

Quad Cities Storage

LeLacheur Park

LeLacheur Park

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Quad Cities Storage

Network System

Email Network System

2 High Back Leather Office Chairs (Black)

11 Mid Back Leather Office Chairs (9 Brown, 2 Black)

Video Board

Video Board

3 - HP Computers

MXW1370CC7 (2011)

MXF7420KPG (2007)

3CU1361Y1D (2011)

Dell Computer (2010)

Acer Computer (2012)

3 - Lenovo Laptops

CBU1807020 (2010)

R90M4G2F (2016)

CBU1807065 (2010)

Merchandise from Team Store (clothing, souvenirs, memorabilia, etc.)

Fill in this information to identify the case:

Debtor name Main Street Massachusetts, LLC

United States Bankruptcy Court for the: DISTRICT OF MASSACHUSETTS

Case number (if known) 22-40924-EDK

☐ Check if this is an amended filing

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING** – Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

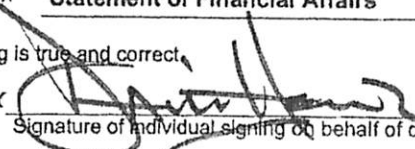
- ☒ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☐ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration **Statement of Financial Affairs**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

2.17.2023

x

  
Signature of individual signing on behalf of debtor

**David Heller**

Printed name

**Managing Member**

Position or relationship to debtor

# EXHIBIT B

<b><u>2021</u></b>	
December 2020 and February 2021 trips to Lowell, MA	\$9,139.55
Tolls for all trips to Lowell, MA	\$230.74
Storage Space Rental – February – December 2021 (11 Months @ \$1,600/Month)	\$17,600.00
<b><u>2022</u></b>	
Storage Space Rental – January – December 2022 (12 Months @ \$1,600/Month)	\$19,200.00
<b><u>2023</u></b>	
Storage Space Rental – January – October 2023 (10 Months @ \$1,600/Month)	\$16,000.00
<b>Total Due to Main Street Iowa, LLC</b>	<b>\$62,170.29</b>